

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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RASUL MUHAMMAD, on behalf of himself and:
all others similarly situated, :
:
Plaintiffs, :
:
v. : No. 1:19-cv-7244
: Judge Robert M. Dow Jr.
PROVIDENCE BANK, : Magistrate Judge Young B. Kim
Defendant. :
:
: -----x

UNOPPOSED MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Plaintiff, Rasul Muhammad, by and through his counsel, Kramer Injury Law LLC, hereby requests that the Court grant him leave to file a Second Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(2), and in support states:

1. Plaintiff filed the above-captioned action on November 2, 2019, naming Providence Financial Corporation as the defendant.
2. Counsel for Providence Bank & Trust informed Plaintiff's counsel via email that "Providence Bank" is the actionable entity, while Providence Financial Corporation is merely a holding company.
3. Thereafter, on December 3, 2019, Plaintiff filed an Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(2) naming Providence Bank as the defendant.
4. The same day, Counsel for Providence Bank & Trust again emailed Plaintiff's counsel that Providence Bank & Trust is the full name of the actionable entity.
5. Counsel for Providence Bank & Trust further stated there would be no opposition to the filing of a Second Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(2), although no appearance for Counsel of any named "Providence Bank" defendant has been filed.

WHEREFORE, the plaintiff respectfully requests that the first amended complaint may be amended as shown in the attached Exhibit 1.

Dated: December 9, 2019

KRAMER INJURY LAW LLC

By: /s/ R. Joseph Kramer

R. Joseph Kramer, Esq.

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ATTORNEYS FOR PLAINTIFF

CERTIFICATION OF NO OPPOSITION BY ANY PARTY

I, R. Joseph Kramer, declare under penalty of perjury and pursuant to the laws of Illinois and the United States that I have in my possession e-mail correspondence from defense counsel dated December 3, 2019 that no opposition to the filing of a Second Amended Complaint to name Providence Bank & Trust would be filed, this motion being a necessary procedural step in accomplishing that goal.

/s/ R. Joseph Kramer

R. Joseph Kramer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served upon all counsel of record entitled to service via the Court's CM/ECF Filing System on December 9, 2019.

/s/ R. Joseph Kramer

R. Joseph Kramer